

IN THE UNITED STATES DISTRICT COURT
FOR THE
EASTERN DISTRICT OF PENNSYLVANIA

SCOTT GANGLOFF	:	
634 Fountain Street	:	CIVIL ACTION NO: 02-CV-4615
Philadelphia, PA 19128,	:	
	:	
Plaintiff,	:	
	:	
v.	:	
	:	
SEARS ROEBUCK & CO.	:	
7300 Bustleton Avenue	:	
Philadelphia, PA 19152,	:	
	:	
and	:	
BAUGHAN & BUSHNELL	:	
MANUFACTURING CO.	:	
P.O. Box 390	:	
11414 Maple Avenue	:	
Hebron, Illinois 60034-0390	:	
	:	
Defendants.	:	

DEFENDANTS' MOTION TO CONTINUE STATUS CONFERENCE

AND NOW, come the Defendants, Sears, Roebuck and Co. and Vaughan & Bushnell Manufacturing Co., by and through their undersigned counsel, and file the within Motion to Continue Status Conference, and in support thereof aver as follows:

1. Your Honor's Third Amended Scheduling Order dated December 16, 2003, schedules a status conference before the Court on March 31, 2004 at 9:30 a.m. A true and correct copy of Your Honor's Order is attached hereto as Exhibit "A."

2. On March 5, 2004, the Honorable Sean McLaughlin of the United States District Court for the Western District of Pennsylvania scheduled a jury trial to begin on March 29, 2004 in the Federal Courthouse in Erie, Pennsylvania. A true and correct copy of Judge McLaughlin's Order is attached hereto as Exhibit "B."

3. The undersigned counsel in this case are also trial counsel in the above-referenced case.

4. At a pretrial conference on March 16, 2004, the parties agreed that the case would take approximately 3-4 days, including March 29, 2004.

5. Counsel respectfully requested that the trial before Judge McLaughlin be rescheduled to alleviate the scheduling conflict. That request was respectfully denied due to that Court's trial schedule.

6. Therefore, counsel respectfully requests that the conference presently scheduled for March 31, 2004, be rescheduled to such time as is convenient for the Court, so that undersigned counsel may be present to represent the Defendants before this Court.

WHEREFORE, Defendants respectfully requests that the conference presently scheduled for March 31, 2004, be rescheduled to such time as is convenient for the Court, so that undersigned counsel may be present to represent the Defendants before this Court.

Respectfully submitted,

Dated: March 18, 2004

AH861
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Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify that I served a true and correct copy of the foregoing **MOTION TO CONTINUE STATUS CONFERENCE** upon counsel of record via facsimile and United States Mail, First Class, postage prepaid, this 18th day of March, 2004, addressed as follows:

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Counsel for Defendants

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P.O. Box 390
11414 Maple Avenue
Hebron, Illinois 60034-0390

Defendants.

CIVIL ACTION NO: 02-CV-4615

ORDER

AND NOW, this _____ day of _____, 2004, upon consideration of the motion to continue status conference submitted by the Defendants, it is hereby ORDERED,

ADJUDGED and DECREED that the status conference scheduled for March 31, 2004 is hereby rescheduled to _____, 2004 at _____.

IT IS SO ORDERED:

_____, J.